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RCRA PROGRAMS BRANCH

BROWN AND
CALDWELL

Environmental Engineering & Consulting

Mr. Don Webster
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

RE: Grenada Manufacturing LLC
Grenada, Mississippi

Dear Mr. Webster:

This letter will serve to summarize some of the items we discussed by telephone on August 3, 2000 regarding the referenced site. In general, we discussed the items addressed in your letter to Don Williams at Grenada Manufacturing dated July 20, 2000. More specifically, we discussed the plans for evaluating interim measures at the site and the need for an updated Quality Assurance Project Plan (QAPP).

You stated in your July 20 letter that the Interim Measures Work Plan has been approved. Therefore, the tasks discussed in the work plan will be initiated. In general, these tasks include collection of additional groundwater data, revision of the Summary of Investigative Work (SOIW) and submittal as an RFI Report, and conduct of a focused interim measures study. During our telephone conversation we further discussed the plans for interim measures at the site. In addition to being used to prepare the RFI Report, the additional groundwater data to be collected will be used to evaluate the need for interim measures. At this time, we anticipate the following may be performed:

- Design and installation of a flow-through wall to address site-wide groundwater. We expect that this effort will be of limited extent and will not address all impacted groundwater at the site (i.e., this will be utilized as a "pilot study" for groundwater treatment).
- Continue manual extraction and disposal of NAPL from the two Areas of Concern. This may be performed using bailers or peristaltic pumps. A standard operating procedure will be prepared for conducting this work.
- Grenada Manufacturing will continue discussions with the USEPA regarding discontinuing use of the Chromium Destruction Pit and beginning closure activities.

The exact nature of the recommended interim measures will be based upon the updated groundwater data collected at the site and will be documented in the Interim

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Measures Study Report described in the work plan. Alternative or additional potential interim measures will be considered as well.

We also discussed the need for an updated QAPP for the site. As we discussed, there are currently two QAPPs being used for sampling and analysis at the site. We prepared the first QAPP in 1991 as part of the initial investigation work. The other QAPP was prepared by Secor and updated by Eco Systems in 1998. You indicated your preference for a single QAPP to address all sampling and analysis related to the site. After some discussion with representatives at Grenada Manufacturing, Arvin Meritor, and Textron, it has been decided that BC will prepare a single QAPP for the site. This updated QAPP will be prepared in accordance with the recent USEPA guidance document (*EPA Guidance for Quality Assurance Project Plans*, EPA QA/G-5, EPA/600/R-98/018, February 1998). Where appropriate, BC will utilize the existing two QAPPs to prepare the updated QAPP.

At this time, we expect to submit a draft updated QAPP by August 28 for review by the USEPA. Because our original schedule estimate for conducting field work and preparing an RFI Report did not consider the need to update the QAPP and obtain USEPA approval, we are requesting that the schedule for submittal of the RFI Report be further modified. Based on a schedule similar to that outlined in the Interim Measures Work Plan, we anticipate being able to transmit an RFI Report to the USEPA within about 12 weeks from receiving approval of the updated QAPP from the USEPA.

We look forward to working with the USEPA and MDEQ in proceeding with the RCRA process at the Grenada site. If I have incorrectly summarized anything in this letter or if you have any questions, please feel free to call me at (615) 255-2288.

Sincerely,

BROWN AND CALDWELL



Dale R. Showers, P.E.
Project Manager
Design & Solid Waste

cc: Louis Crawford, P.E., MDEQ
John Bozick, Arvin Meritor
Don Williams, Grenada Manufacturing
John Kandler, Textron